

EXHIBIT 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

Index No. 160694/2019

-against-

Hon. Doris Ling-Cohan

DONALD J. TRUMP, in his personal capacity,

Defendant.

**PLAINTIFF'S FIRST NOTICE TO SUBMIT TO PHYSICAL EXAMINATION
TO DEFENDANT DONALD J. TRUMP**

PLEASE TAKE NOTICE THAT, pursuant to CPLR § 3121, Defendant Donald J. Trump is required to submit to a physical examination by LabCorp at its office located at 1145 19th Street NW #601, Washington, D.C. 20036, or at another location convenient for Defendant, on March 2, 2020, at 9 a.m. The examination shall obtain a buccal, blood or skin cell sample from Defendant sufficient for DNA analysis and comparison against unidentified male DNA present on the dress that Plaintiff wore during the sexual assault at issue in this action. *See Exhibit A.*

Dated: New York, New York
January 30, 2020

By: /s/ Roberta A. Kaplan
Roberta A. Kaplan
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Counsel for Plaintiff E. Jean Carroll

EXHIBIT A



Laboratory Report¹

Robert Kaplan, Esq. Kaplan, Hecker, & Fink LLP 350 Fifth Ave., Ste 7110 New York, NY 10118	Report Date: January 8, 2020 FACL Case #: 20190357 Client #: 21497 Client Case #: 160694/2019
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Case Name: E. Jean Carroll v. Donald Trump

Report Type: Physical Evidence Examination and DNA Analysis

Background and Purpose of Examination

The following information is taken from a complaint filed November 4, 2019 with the New York Supreme Court by Roberta Kaplan, counsel for E. Jean Carroll in which it is alleged:

Approximately 23 years ago, E. Jean Carroll visited Bergdorf Goodman, a luxury department store in New York City, to shop. Upon leaving the store, Carroll ran into Donald Trump, with whom she was acquainted. Trump asked Carroll to assist him in purchasing a gift at Bergdorf Goodman for a girl. Carroll agreed and they both entered the store. While browsing the store, Trump suggested visiting the lingerie department. He insisted Carroll try on a see-through bodysuit and maneuvered her into a dressing room, closing the door behind them. At that moment, Trump assaulted Carroll. During the assault, Trump grabbed Carroll's arms, pinned her against the wall, placed his hand under her dress, pulled down her tights, and fondled her vagina with his fingers. He unzipped his pants and forced his penis inside of her. Shortly thereafter, Carroll was able to free herself and ran out of the dressing room and out of the store. The dress and shoes she wore at the time of the assault were kept in her closet until 2019 when Carroll donned them for a photoshoot.

Kaplan requested Forensic Analytical Crime Lab (FACL) examine the dress and shoes to determine if male biology, specifically semen, is present. Additionally, to determine if [REDACTED] [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED] – all individuals

¹ This report was published in full-color and should be read in that form.

who possibly came into contact with the dress at the time of the photoshoot – can be eliminated as contributors to any biology foreign to E. Jean Carroll.

Items of Physical Evidence

The following item of physical evidence was received at FACL from Oliver Farnum of Kaplan, Hecker, & Fink LLP on November 7, 2019 via FedEx courier:

1. A reference buccal specimen from E. Jean Carroll.

The following item of physical evidence was received at FACL from Alina Mogilyanskaya of Mintz Group LLC on November 8, 2019 via FedEx courier:

2. A black dress.

The following item of physical evidence was received at FACL from E. Jean Carroll on November 13, 2019 via FedEx courier:

3. A pair of shoes.

The following items of physical evidence were received at FACL from Oliver Farnum of Kaplan, Hecker, & Fink LLP on December 13, 2019 via FedEx courier:

4. A reference buccal specimen from [REDACTED].
5. A reference buccal specimen from [REDACTED].
6. A reference buccal specimen from [REDACTED].
7. A reference buccal specimen from [REDACTED].

The following item of physical evidence was received at FACL from Oliver Farnum of Kaplan, Hecker, & Fink LLP on December 19, 2019 via FedEx courier:

8. A reference buccal specimen from [REDACTED].

Evidence Examination

Reference Specimens

Descriptions and processing of the reference swab specimens for DNA analysis are summarized in Table 1. The external packaging and the reference swabs are shown in Figures 1 through 6.

Table 1. Reference specimen processing summary.

FACL Item No.	Description of Reference Specimen	Total Human DNA recovered, ng	DNA Typing Assay, ng
1	E. Jean Carroll reference buccal swabs (2) – stained light brown, one whole swab consumed for analysis → <u>1A</u>	~ 1123	~ 0.8
4	████████ reference buccal swab (1) – stained light yellow, approximately ½ of swab consumed for analysis → <u>4A</u>	~ 416	~ 0.8
5	████████ reference buccal swab (1) – stained faint yellow, approximately ½ of swab consumed for analysis → <u>5A</u>	~ 861	~ 0.8
6	████████ reference buccal swab (1) – stained light yellow, approximately ½ of swab consumed for analysis → <u>6A</u>	~ 853	~ 0.8
7	████████ reference buccal swab (1) – stained very pale yellow, approximately ½ of swab consumed for analysis → <u>7A</u>	~ 601	~ 0.8
8	████████ reference buccal swab (1) – stained light brown, approximately ½ of swab consumed for analysis → <u>8A</u>	~ 1289	~ 0.8



Figure 1. E. Jean Carroll reference buccal specimen [#1], packaging and swabs before sampling.

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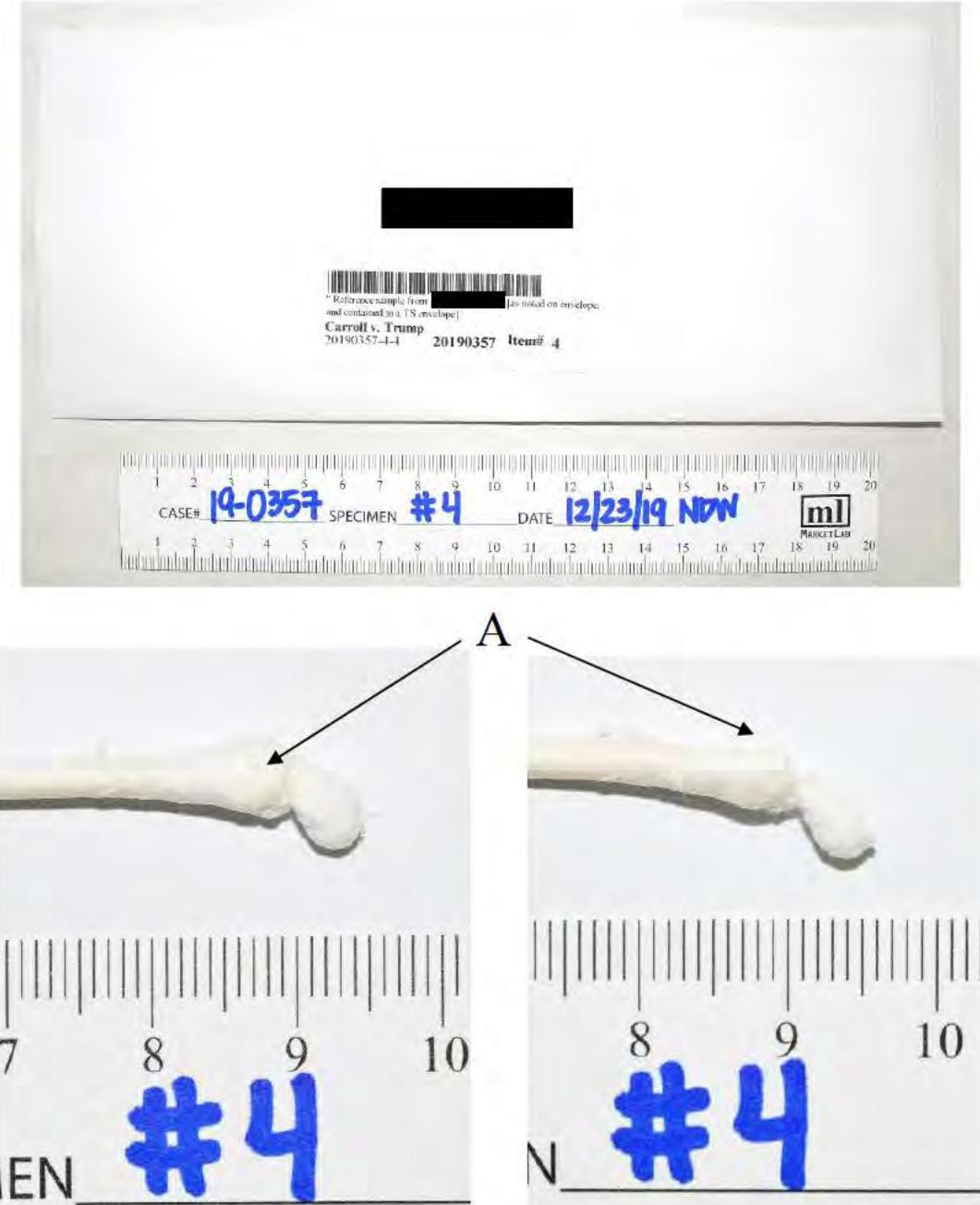


Figure 2. [REDACTED] reference buccal specimen [#4], packaging and swab before and after sampling.



Figure 3. [REDACTED] reference buccal specimen [#5], packaging and swab before and after sampling.

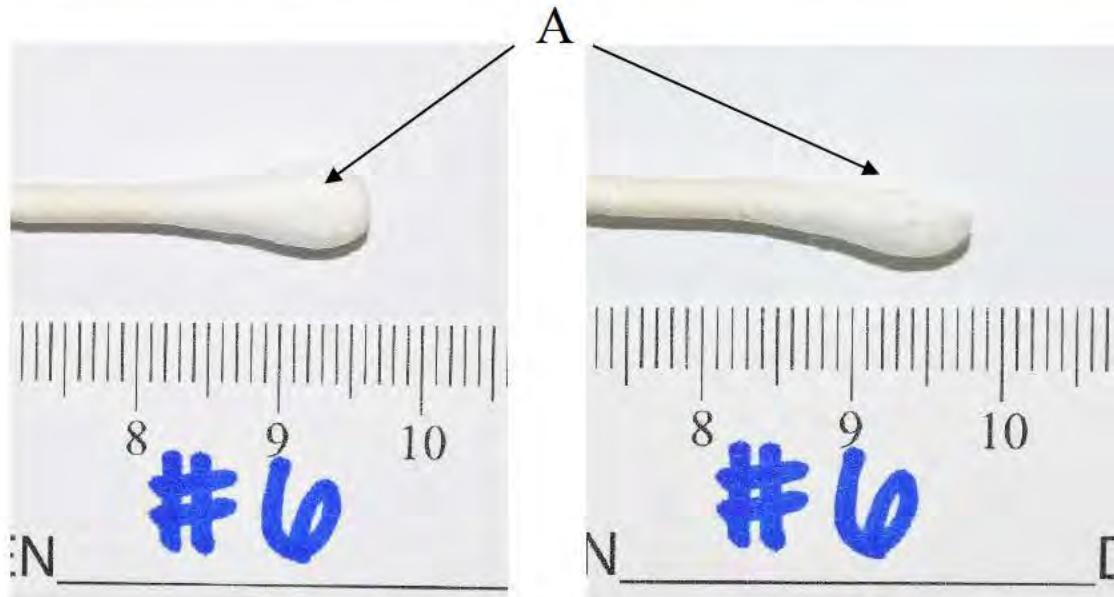
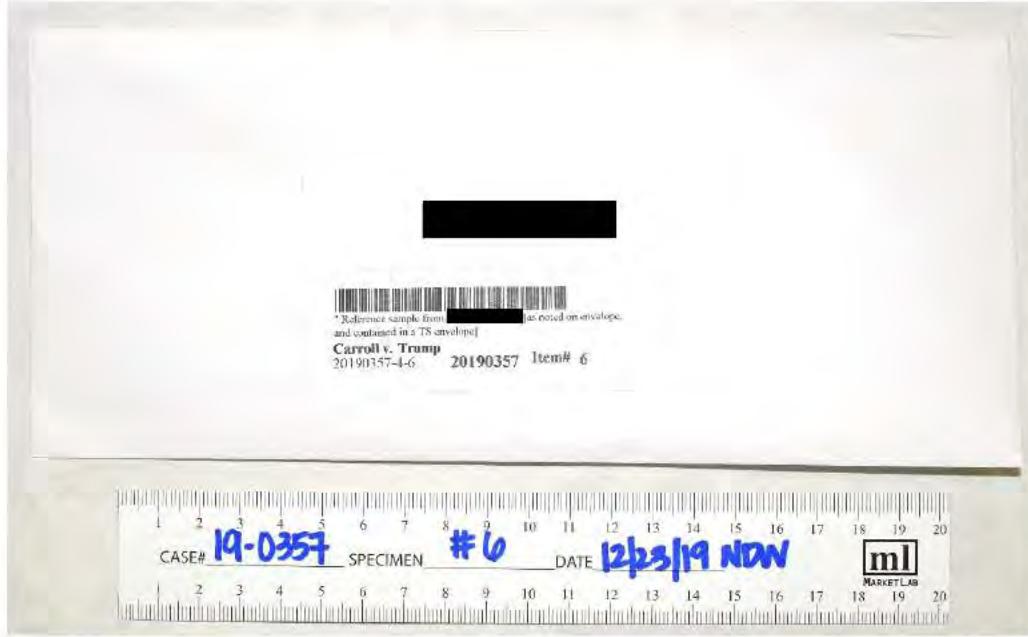


Figure 4. [REDACTED] reference buccal specimen [#6], packaging and swab before and after sampling.

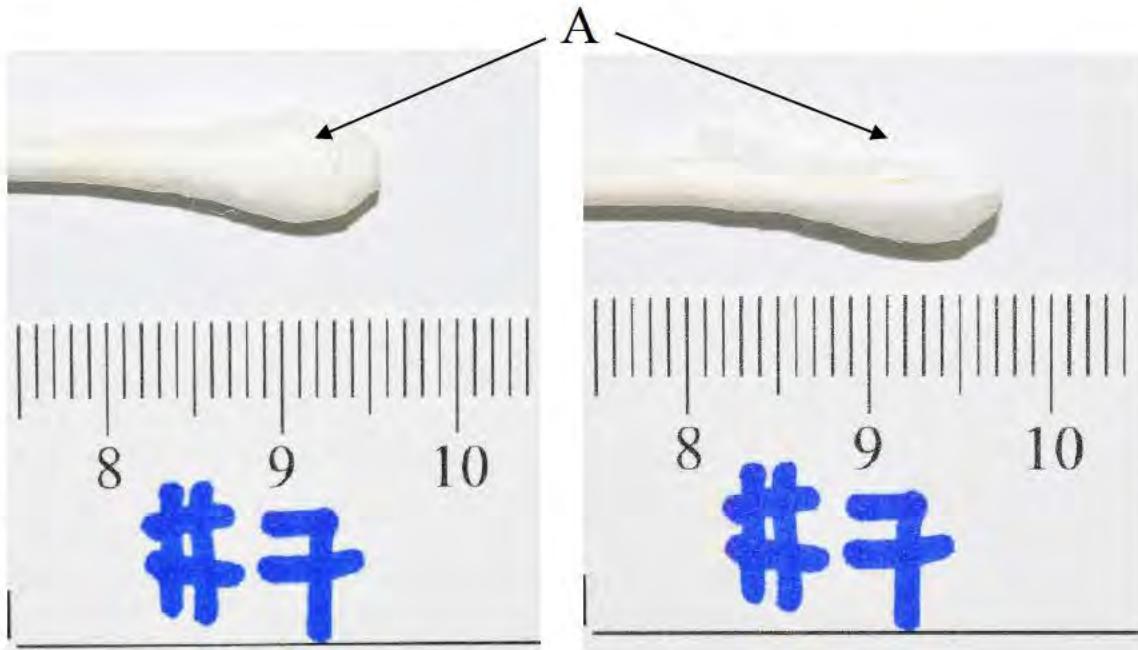


Figure 5. [REDACTED] reference buccal specimen [#7], packaging and swab before and after sampling.

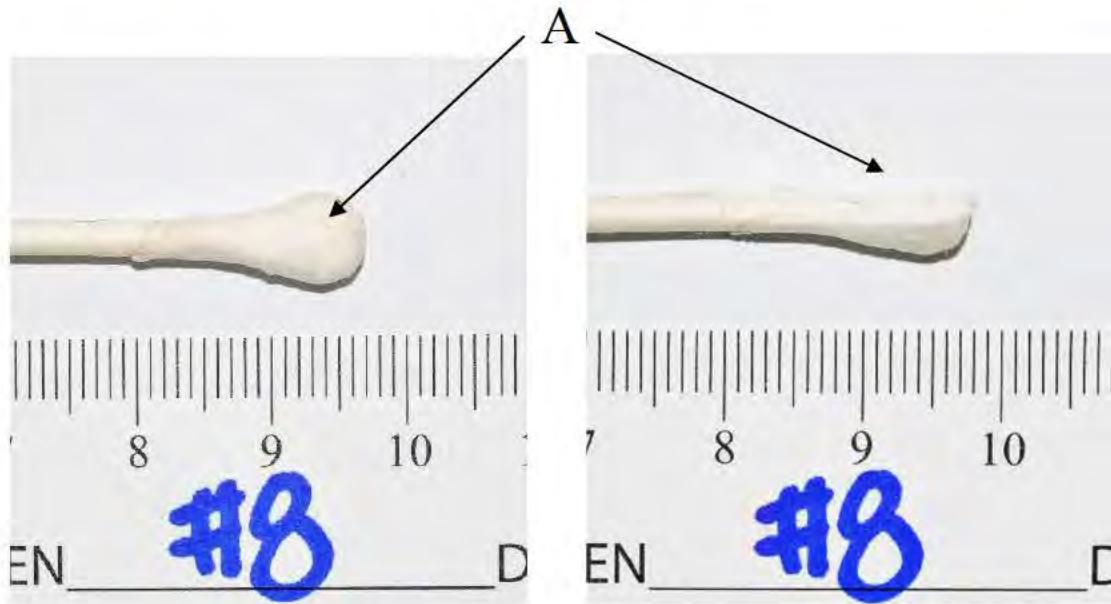


Figure 6. [REDACTED] reference buccal specimen [#8], packaging and swab before and after sampling.

Item #2 Dress

A black "Donna Karan" brand jacket dress [#2] was submitted to FACL for examination.

The packaging for this specimen is shown in Figure 7. The outside and inside surfaces of the dress are shown in Figures 8 through 11. The dress is size 6 and appeared minimally worn. Some apparent animal hairs were noted on the dress. Several scuff/wear marks and/or stains were observed on the outer surface of the dress, most notably the backs of the sleeves. Numerous fluorescent deposits were revealed on the dress with high intensity filtered (450 nm) light. Acid phosphatase activity, a presumptive indication of the presence of semen, was not detected in any of thirty-three fluorescent stains tested on the dress. Various surface areas of the dress were swabbed to collect biological material. Descriptions and processing of the sample swabs taken from the dress are summarized in Table 2. The surface areas swabbed are illustrated in Figures 8 through 10. The sample swabs are shown in Figures 12 through 17. All the swabs were consumed for analysis. The results of these analyses are described below.



Figure 7. Dress [#2], external and nested packaging.

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Figure 8. Dress [#2], outside front showing approximate sample areas A, B, C, D, and E.



Figure 9. Dress [#2], outside back showing approximate sample areas A, B, C, and D.



Figure 10. Dress [#2], inside front showing approximate sample area F.



Figure 11. Dress [#2], inside back.